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ABSTRACT

Each year, the Governor of California issues the Governor's Coordination and Special Services Plan (GCSSP) providing goals and objectives related to program funding and special initiatives. This report presents modifications to the GCSSP for July 1, 1993-June 30, 1994, including new language for changed sections of the GCSSP related to program information and activities. The report first describes changes related to program information, indicating that the Governor's goals and objectives for program year (PY) 1992-93 were replaced by those for PY 1993-94, and describing measures to be taken by the state to ensure coordination and non-duplication of Job Opportunities and Basic Skills training programs and of Service Delivery Area (SDA) linkages with federally authorized programs. Changes related to program activities are then addressed, including complete descriptions of the following: (1) the state's projected use of resources as of PY 1993-94 (i.e., $104,119,438 for Title IIA, $86,849,261 for Title IIB, and $76,701,237 for Title IIC); (2) oversight policies to ensure fiscal accountability; (3) Title II-funded training activities for adults and youth; (4) use of State Education and Coordination Grants, including designation of the agencies that will administer them and projects to be funded; and (5) SDA involvement in capacity building and technical assistance funds. Attachments include vision and mission statements from the State Job Training Coordinating Council; 1993 goals and objectives for California's Job Training and Placement Programs; and a chart of barriers to employment, with the corresponding Title II category. (KP)

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Modifications to the Governor's Coordination and Special Services Plan, July 1, 1993 - June 30, 1994.

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California State Department of Employment Development

SC 950 105

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EDD Serving the People of California

State of California / Health and Welfare Agency — Pete Wilson, Governor

June 14, 1993

REFER TO: 69:98:va
(916) 654-7607

Ms. Dolores Battle, Administrator
Office of Job Training Programs
U.S. Department of Labor
Employment and Training Administration
200 Constitution Avenue, N.W. Room N4459
Washington, DC 20210

Dear Ms. Battle:

GOVERNOR'S COORDINATION AND SPECIAL SERVICES PLAN MODIFICATIONS

Enclosed are three copies of the Modifications to the Governor's Coordination and Special Services Plan (GCSSP) for the period July 1, 1993, through June 30, 1994. These modifications are as a result of the enactment of the Job Training Amendments of 1992, and are consistent with the requirements of Training and Employment Guidance Letter (TEGL) No. 4-92, dated February 5, 1993.

The Modifications to the GCSSP were approved by the State Job Training Coordinating Council at its meeting of June 10, 1993, and signed by the Director of the Employment Development Department on behalf of the Governor. As required by TEGL No. 4-92, each copy of the enclosed Modifications to the GCSSP bears an original signature.

If you have any questions about the Modifications to the GCSSP, please contact Judy Kuhlman, Ph.D., Chief, Job Training Partnership Division, at (916) 654-7110.

Sincerely,

THOMAS P. NAGLE
Director

Enclosures

cc: Don Balcer, DOL Region IX Administrator
Christine Chudd, Region IX
Dean Smith, #67
Carlos L. Lopez, #87
Virginia Hamilton, #69

STATE OF CALIFORNIA

MODIFICATION TO GOVERNOR'S COORDINATION AND SPECIAL SERVICES PLAN

July 1, 1993 — June 30, 1994

I. IDENTIFYING INFORMATION

A. Name and Address of the Grantee:

Governor Pete Wilson
State Capitol
Sacramento, CA 95814

B. Date of Submission of the Modification:

June 15, 1993

Number of the Modification:

Modification No. 1

C. Time Period Covered:

July 1, 1993 through June 30, 1994

D. The specific changes to be made in the Governor's Coordination and Special Services Plan (GCSSP) and the reason(s) for the modification. (Describe the section of the plan where this information is included.)

1. Replaces Program Year (PY) 1992-93 Governor's Goals and Objectives with Program Year (PY) 1993-94 Goals and Objectives. [Replaces GCSSP Attachment II, pages 1-7.]

2. Expands the description of the measures to be taken by the state to ensure coordination and non-duplication with the Job Opportunities and Basic Skills (JOBS) training program pursuant to Job Training Partnership Act (JTPA) Section 121(b)(2) and 20 Code of Federal Regulation (CFR) 628.205(a)(2). [Modifies GCSSP Page 5, B. 7, Coordination Criteria.]

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3. Expands description of Service Delivery Area (SDA) linkages with federally authorized programs and other appropriate organizations and agencies pursuant to JTPA Section 205 and 20 CFR 627.220. [Modifies GCSSP Pages 3-7, Coordination Criteria.]

4. Adds a description of the general standards for Private Industry Council (PIC) oversight responsibilities pursuant to 20 CFR 627.475. [Modifies GCSSP Page 3, B.1.]

5. Updates the state's projected use of resources for PY 1993-94, pursuant to JTPA Section 121(b)(3) and 20 CFR 628.205. [Modifies GCSSP Pages 12-23, Projected Use of Resources.]

6. Amends description of the use of 8 percent funds pursuant to JTPA Section 123(c) and 20 CFR 628.205 and 628.315(b). [Modifies GCSSP Pages 12-13, C.1.b., State Education Coordination and Grants.]

7. Amends description of plans for use of the 5 percent set-aside to support Services to Older Individuals pursuant to 20 CFR 628.320. [Modifies GCSSP Page 14, C.1.d., Training Programs for Older Individuals.]

8. Amends goals relative to Nontraditional Employment for Women (NEW) Act. [Modifies GCSSP Attachment II, Goals and Objectives No. 1, Page 4.]

9. Amends description of the state's procurement system pursuant to JTPA Section 164(a) and 20 CFR 627.420. [Replaces GCSSP Page 23, Item V.A., Procurement Systems.]

II. PROGRAM INFORMATION

A. Goals and Objectives

The Governor's Goals and Objectives for PY 1993-94, including an expansion of NEW goals, are described in the attached Attachment II. (Note: No change is being made to the existing GCSSP Attachment I entitled, "A California Jobs Policy.")

B. Coordination

1. ***Describe the measures taken by the state to ensure coordination and non-duplication with the JOBS training program. [Section 121(b)(2) and 20 CFR 628.205.]***

In California, the JOBS program is known as the Greater Avenues for Independence (GAIN) program. A description of the measures taken by the state to ensure coordination and to avoid duplication between agencies administering the state's GAIN program and JTPA programs is in the current GCSSP (Page 5, Section B., Item 7, Coordination Criteria). As stated therein, California law (Welfare and Institutions Code Section 11320.8) requires that when submitted to the state for approval, each county GAIN plan must be accompanied by a letter from the PIC, or councils in a multiservice delivery area county, certifying the level of local coordination, including joint planning and the use of local labor market information. The state law further provides that each county welfare department (which administers the local GAIN plan), shall afford any local PIC, local legal aid and welfare rights representatives, and local housing authorities responsible for administering public housing programs an opportunity for prior review and comment on county GAIN plan updates and revisions.

State law also requires that each local JTPA job training plan contains a description of the coordination with and the uses made of other agencies and organizations within the SDA providing job training, vocational education, client advocacy, child care and employment services, including how the SDA and the county welfare department have mutually and cooperatively planned the level and nature of services to GAIN participants. Additionally, in accordance with Section 15006(b) of the California Unemployment Insurance Code, each JTPA job training plan must contain a certification from the county that the JTPA job training plan is consistent with the county's GAIN plan. In the event that a JTPA job training plan does not contain the required certification of consistency with the GAIN plan, the State Job Training Coordinating Council (SJTCC) will determine if the two plans are consistent and, if appropriate, will authorize the certification of consistency. The SJTCC is responsible for reviewing not only the GAIN plan, but the plans of <u>all</u> state agencies providing employment, training and related services, and promoting coordination and linkages among those programs and JTPA.

2. *Linkages*

To ensure that the SDAs establish appropriate linkages and coordination procedures with other federal programs and with appropriate education and training agencies pursuant to JTPA Section 205 and 20 CFR 627.220, the state, as part of the planning guidance for the preparation of SDA local job training plans, instructs SDAs as follows:

One of the criteria for approving the job training plan is the adequacy of coordination linkages. Each SDA must comply with the requirements for educational linkages under JTPA Section 265. In addition, each SDA must define linkage as it applies locally. To be considered acceptable, a linkage must clearly enhance the provision of services within the SDA. Therefore, a linkage must involve more than occasional meetings and informal arrangements. The local definition of linkage must include, as a minimum, written operational agreements with other entities which result in one or more of the following:

a. an increase in the total number of persons served in the affected programs;

b. a qualitative and quantitative increase in the services provided to participants in the affected programs that is consistent with the needs of the participant;

c. arrangements to share client data and other relevant program information;

d. measurable changes in decreasing duplication of services, or in increasing effective use of existing resources between the affected programs;

e. agreements or contractual arrangements to share certain resources and/or costs of training participants in affected programs, consistent with regulations of the affected programs;

f. comprehensive service strategies for participants in the affected programs;

g. formal agreements (monetary or nonmonetary) involving joint planning, service delivery or other arrangements;

h. other elements which enhance program services.

The criteria for linkage may include several of the above listed elements. Each linkage within the SDA must be a written operational agreement and must meet one or more of the SDA criteria in order to be considered a "qualifying linkage."

III. PROGRAM ACTIVITIES

A. *Projected Use of Resources*

1. ***Describe the state system for the state and substate allocation of JTPA funds including the following: Title II-A, II-B, and II-C; education coordination and grants (8 percent); administrative, management, and auditing (5 percent); incentive grants, capacity building and technical assistance (5 percent) and services for older individuals (5 percent). [Section 121(b)(3).]***

The state system for allocation of JTPA funds is as follows:

Title II-A (77 Percent Allocation)

The Governor allocates 77 percent of the state's JTPA Title II-A allotment among the 52 SDAs in the state by formula specified in JTPA Section 202(b). For PY 1993-94, this allocation amount is $104,119,438.

Title II-B (100 Percent Allocation)

The Governor allocates 100 percent of the state's JTPA Title II-B allotment among the 52 SDAs in the state by formula specified in JTPA Section 252(b). For PY 1993-94, this allocation amount is $86,849,261.

Title II-C (82 Percent Allocation)

The Governor allocates 82 percent of the state's JTPA Title II-C allotment among the 52 SDAs in the state by formula specified in JTPA Section 262(b). For PY 1993-94, this allocation amount is $76,701,237.

State Education Coordination and Grants (8 Percent Allocation)

The Governor allocates 8 percent out of the 23 percent of the states Title II-A allotment for State Education Coordination and Grants (SECG) pursuant to JTPA Section 202(c)(1)(C) and 262(c)(1)(C) and 20 CFR 628.315. The state's system for allocating the 8 percent funds is described below on pages 16-17, Section 6(d). For PY 1993-94, the allocation amount of 8 percent funds is $18,300,652.

Administrative, Management, and Auditing (5 Percent Allocation)

The Governor allocates 5 percent of the state's JTPA Title II-A and II-C allotment for overall administration, management, and auditing activities relating to programs under Title II-A and II-C and for

carrying out Additional State Responsibilities pursuant to JTPA Sections 121 (GCSSP), and Section 122 (SJTCC). For PY 1993-94, this allocation amount is $11,437,908.

Incentive Grants, Capacity Building and Technical Assistance (5 percent Allocation)

The state utilizes 5 percent each of the state's JTPA Title II-A and II-C allotment for incentive grants to SDAs for programs under Titles II-A and II-C pursuant to JTPA Section 106(b)(7). For PY 1993-94, this amount is $7,629,085.

The state will utilize up to 33 percent of the 5 percent funds under Titles II-A and II-C for Capacity Building and Technical Assistance to SDAs in accordance with JTPA Sections 202(c)(2)(A) and 262(c)(2)(A). For PY 1993-94, this amount is $3,808,823.

Services for Older Individuals (5 percent)

The Governor allocates 5 percent of the state's JTPA Title II-A allotment for Services for Older Individuals pursuant to JTPA Section 202(c)(D). For PY 1993-94, this allocation amount is $6,761,003.

2. ***Describe the State's administrative system to assure oversight of the programs operated in the SDAs as well as those state-supported programs operated throughout the state. The discussion should include a description of the role of the SJTCC or Human Resource Investment Council (HRIC) in program operations and oversight. Specify the role of the SJTCC in oversight of Title II-A, II-B, II-C, 8 percent State Education Coordination and Grants, programs for older individuals, and incentive, capacity building and technical assistance programs. [Section 121(b)(3).]***

No major change from current GCSSP; i.e., the Director of the Employment Development Department (EDD) is responsible for JTPA administration in California. Within EDD, there are four Divisions which have responsibility for the major JTPA oversight activities. The Job Training Partnership Division (JTPD) has the primary responsibility for administering JTPA in California. Other oversight Divisions include Audit, Evaluation and Investigation.

The State of California will not establish a HRIC as authorized by Title VII of JTPA to serve in lieu of the SJTCC. The SJTCC will continue to

perform the functions authorized under JTPA Sections 122 and 317 to advise the Governor on JTPA-related matters.

The SJTCC serves as the Governor's advisory body for promoting coordination of employment and training programs and resources throughout the state. It provides advice and counsel to assist the Governor in planning, coordinating and monitoring the provision of programs and services established under JTPA and under the state's JTPA enabling legislation, the Family Economic Security Act (FESA). The Council develops and recommends policy to guide the operation and oversight of JTPA; recommends funding allocations; and recommends approval of job training plans developed by SDA. The SJTCC promotes coordination among state and federal job training, vocational education, job placement, and social service programs operating in California.

Specifically, the SJTCC:

- recommends policy for all aspects of JTPA to the Governor through the state's Secretary of Health and Welfare;
- develops and recommends the GCSSP to the Governor;
- advises the Governor, SDAs, and the PICs on the consistency of the local job training plans with the GCSSP and recommends approval or modification as appropriate;
- reviews the operation of local JTPA and state employment and training programs in each SDA to determine adequacy, and makes recommendations for improvements to the Governor, chief elected officials, PICs, services providers, the California Legislature, and the public;
- reviews and comments on the state plans of state agencies providing employment, training, vocational education and related services and makes recommendations to the Governor, the Legislature and appropriate state and federal agencies.

General Standards for PIC Oversight Responsibilities

In accordance with Interim Final Rule 20 CFR 627.475, the Governor has established general standards for PIC oversight responsibilities. The PIC shall oversee activities conducted under the job training plan for the SDA in accordance with procedures it develops pursuant to

Section 103 of the JTPA, its implementing regulations, Section 15032 of the California Unemployment Insurance Code, and the following standards:

1. The SDA administrative entity must conduct on-site monitoring visits to all service providers twice each program year.

2. Programs and activities conducted in the SDA administrative entity must be operated in compliance with JTPA and all applicable federal, state, and local laws and regulations.

3. All JTPA-funded service provider contracts must be for allowable activities, contract charges must be allocated to appropriate cost categories, and proper fiscal records must be maintained.

4. The selection of service providers must be made in accordance with JTPA Section 107, 20 CFR 627.422 and the state's standards for procurement.

5. The programs designed and operated by the SDA administrative entity must be consistent with the coordination criteria of the GCSSP.

6. Programs and activities must be effective in meeting the goals established in the job training plan.

7. Where SDA administrative entities are parties to contracts which serve multiple SDA jurisdictions, the affected SDAs must coordinate and must jointly establish procedures for monitoring multiple-SDA contracts.

8. The training and work environment must be safe for participants and staff members.

9. The SDA administrative entity must establish and operate appropriate and effective systems that comply with the nondiscrimination and equal opportunity provisions of JTPA and other federal and state nondiscrimination laws.

10. The SDA administrative entity must coordinate programs and activities with all appropriate agencies at the local level.

3. ***Describe the state's administrative activities, and procurement and financial management policies, including auditing and oversight to be conducted using the funds allocated to the state for administrative, financial management and auditing activities. [Section 121(b)(3).]***

The JTPD conducts a resource assessment survey annually to determine the needs of state level units in meeting administrative and oversight requirements of the JTPA. The process includes, but is not limited to, a zero based budget process for each entity that has personnel supported with JTPA funds.

In order to ensure fiscal accountability and prevent fraud and abuse in programs administered under the JTPA, the following procurement policy shall apply to all JTPA-related goods and services procured:

a. Procurements shall be conducted in a manner providing full and open competition, and shall be conducted at intervals of not less than once in every three years.

b. Procurement of service providers shall, to the extent practicable, be on a competitive basis, and shall require that determinations of demonstrated performance are made in writing prior to any award of a grant, subgrant, contract or subcontract. The determinations of demonstrated performance shall take into consideration those factors described in 20 CFR 627.422(d) and (g) of the JTPA Interim Final Rule.

c. Small purchase procurement shall be conducted, and rate and price quotations shall be secured, based on the following requirements:

Dollar range of purchase	Bidder contacts and method
$0 to $499	None required
$500 to $999	two documented bids*
$1,000 to $24,999	three written bids*
$25,000 and over	RFP or formal advertising*

*Unless sole source justification exists.

d. The use of sole source shall be minimized to the extent practicable, but in every case shall be justified. If described and approved in the local job training plan, an SDA may sole source to public and nonprofit private secondary schools for those in-school youth programs which require the schools to be the program operator. For

purposes of securing OJT contracts with private employers, the use of small purchase procedures, sealed bids and competitive proposal procurement methods are not considered feasible, and therefore, the procurement of OJT contracts may be conducted noncompetitively. The enrollment of an individual participant in classroom training may be procured noncompetitively if the award of the contract for such enrollment under small purchase procedures, sealed bids or competitive proposals would delay the participant's entry into an available training class.

e. Procurements shall include an appropriate analysis of the reasonableness of costs or prices.

f. Procurements shall not provide excess program income or excess profit.

g. Procurements shall clearly specify deliverables and the basis for payment.

h. Written procedures shall be established for procurement transactions.

i. Procurement activities shall be documented in writing.

j. Subrecipients shall not use funds provided under the JTPA to duplicate facilities or services available in the area (with or without reimbursement) from federal, state, or local sources, unless it is demonstrated that the JTPA-funded alternative services or facilities would be more effective or more likely to achieve performance goals.

k. No subrecipient, contractor or subcontractor shall engage in any conflict of interest, actual or apparent, in the selection, award, or administration of a contract or grant under the JTPA.

l. All subrecipients shall conduct oversight to ensure compliance with procurement standards.

m. Procurement transactions between units of state or local governments, and any other entities organized principally as the administrative entity for service delivery areas, shall be conducted on a cost reimbursable basis.

n. Each subrecipient shall use its own procurement procedures which reflect applicable state and local laws and regulations, provided that the subrecipient's procurement procedures also comply with the requirements of JTPA regulations and with the standards established by the Governor.

The SJTCC has issued an audit policy which requires SDAs to submit an audit plan listing its contractors and the method by which audit requirements will be met. The JTPD reviews selected SDA subrecipient audits and their resolution to determine the adequacy of the SDA's actions. State monitors review and test SDA audit and issue resolution systems on an annual basis to ensure compliance with oversight requirements contained in JTPA and its enabling regulations as well as applicable state and local policies and procedures.

Financial Management support is provided by the EDD Fiscal Programs Division through the maintenance of the "Books of Original Entry" and management of the "Electronic Cash Transfer System." The JTPD maintains an "Annual Subgrant" used to allocate funds to SDAs and other program operators and provide authority for the expenditure of such funds.

4. ***Describe the training activities to be funded with Title II-A, II-B, and II-C funds. [Section 121(b)(3).]***

The training activities to be funded with Title II-A, II-B, and II-C funds are developed in accordance with locally identified needs. A description of these activities is provided in a locally developed job training plan. In general, training activities to be funded with Title II-A will prepare adults for participation in the labor force by increasing their occupational and educational skills, resulting in improved long-term employability, increased employment and earnings, and reduced welfare dependency.

Training activities to be funded under Title II-B will: (1) enhance the basic educational skills of youth; (2) encourage school completion or enrollment in supplementary or alternative school programs; (3) provide eligible youth with exposure to the world of work; and (4) enhance the citizenship skills of youth.

Training activities to be funded with Title II-C funds will improve the long-term employability of youth, enhance the educational, occupational, and citizenship skills of youth, encourage school completion or enrollment in alternative school programs, increase the

employment and earnings of youth, reduce welfare dependency, and assist youth in addressing problems that impair the ability of youth to make successful transitions from school to work, apprenticeship, the military, or postsecondary education and training.

5. ***Describe the types of training and participant support activities to be funded with services for older individuals funds. [Section 204(d) and 20 CFR 628.320.]***

No significant change from current GCSSP (page 14). The full range of services and support available under the amended Title II-A program will be available to this group.

(a) ***Describe the state's procedures for accomplishing consultation with the PIC when providing services to older individuals. [Section 204(d) and 20 CFR 628.320.]***

Prior to July 1, 1993, the JTPD will write a letter to all PIC Chairs advising them of the availability of funds for services to older individuals for PY 1993-94. For PY 1994-95, allocation strategy will be developed in consultation with a workgroup consisting of PIC/SDAs, Title V contractors, representatives from the JTPD and the California Department of Aging.

(b) ***Describe the state's policy for providing services to individuals with additional barriers to employment. List the SDAs and additional barriers approved by the Governor. [Section 204(d)(5)(B) and 20 CFR 628.320.]***

1) Additional barriers to employment for Titles II-A and II-C [JTPA Sections 203(d) and 263(h); 20 CFR 628.605(d) and 628.805(e)]

Sections 203(d) and 263(h) of the JTPA as amended, and Sections 628.605(d) and 628.805(e) of the Interim Final Rule, require that, beginning with PY 1993, not less than 65 percent of program participants under Titles II-A and II-C must be considered hard-to-serve. Hard-to-serve individuals are defined as individuals who have one or more serious barriers to employment. The Act allows SDAs to select one locally applicable serious barrier for the Title II-A adult program and one each for the Title II-C in-school and out-of-school youth programs in addition to those already specified in JTPA. To assist SDAs in choosing appropriate additional barriers, the

state has developed a pre-approved listing of barriers from which SDAs may select.

The purpose of the pre-approved list is to accord SDAs the option to select an additional barrier with the pre-approval of the Governor to facilitate program planning and to eliminate the wait for formal approval from the state. The state has also established criteria for the selection and approval of additional barriers not on the state's pre-approved listing, since the statewide list may not be applicable in all SDAs in the state. Additional barriers are reviewed and approved based on these criteria.

In accordance with JTPA Sections 203(d)(3) and 263(h)(3) which require that information about the Governor's approval of additional barriers be included in the Governor's Coordination and Special Services Plan, please refer to the following attached exhibits: Exhibit 1, State-approved Additional Barriers to Employment; Exhibit 2, Criteria for State's Approval of Additional Barriers; and Exhibit 3, Additional Barriers Selected by SDAs and Approved by the Governor. Due to delays in announcing the State-approved Additional Barriers to Employment, some of California's SDAs were unable to obtain the approval of their PIC in time for the state to include them in Exhibit 3. Exhibit 3 will be amended when all SDAs have selected additional barriers and the state has reviewed and approved them.

2) Governor's identification of serious barriers to employment for older individuals who are not economically disadvantaged [JTPA Section 204(d)(5)(B) and 20 CFR 628.320(d)]

JTPA [Section 204(d)(5)(B)] and the Interim Final Rule [Section 628.320(d)] establish that up to 10 percent of the participants receiving services for older individuals may be non-economically disadvantaged if they have serious barriers to employment and have been determined within the last 12 months to meet the income eligibility requirements for Title V of the Older Americans Act of 1965. The Interim Final Rule also requires the Governor to identify those serious barriers to employment for the purpose of determining the eligibility of non-economically disadvantaged persons to receive JTPA services for older individuals.

In accordance with this requirement, older individuals who are not economically disadvantaged but who have been determined, within the 12 months prior to eligibility determination, to meet the income eligibility requirements for Title V of the Older Americans Act of 1965, may be eligible for JTPA services available under JTPA Section 204(d) if they also have one or more barriers, including but not limited to, the following:

- basic skills deficient
- school dropout
- recipient of cash welfare payment
- disabled
- offender
- homeless
- limited English language proficient
- displaced homemaker
- veteran
- alcoholic
- addict
- non-cash welfare recipient
- resident of public housing
- migrant or seasonal farmworker
- victim of family violence or disruption
- resident of a high crime or high poverty area identified by the PIC
- single parent or grandparent with dependent children under age six.

6. *Describe the projected use of SECG (8 percent) funds. [Section 123(c).]*

(a) *Identify the state education agency(ies) responsible for education and training that will be the recipient(s) of these funds. [Section 123 and 20 CFR 628.315.]*

The Superintendent of Public Instruction of the California Department of Education (CDE) is the state education agency as described in Section 123 (a) and Section 4 (23) of the JTPA. Based on recommendations of CDE, in collaboration with the Chancellor's Office of the California Community Colleges (COCCC), the SJTCC provides policy guidance for the use of 8 percent SECG funds. For administrative purposes, both CDE and COCCC will receive SECG funds, commensurate with their responsibilities, through Interagency Agreements with the EDD.

(b) *Describe the projects to be funded. [Section 123(a)(2) and 20 CFR 628.315(c)(2).]*

The projects to be funded include comprehensive programs for the following priorities:

- School-to-work transition services of demonstrated effectiveness that increase the rate of graduation from high school, or completion of the recognized equivalent thereof, including services that increase the rate at which school dropouts return to regular or alternative schooling and obtain a high school degree or its equivalent, and, which may include, services to support multiyear dropout prevention programs, linkages to build career pathways for movement from school to work, or the establishment of worksite experience to enhance the school-to-work transition of demonstrated effectiveness;

- Adult literacy and lifelong learning opportunities and services of demonstrated effectiveness that enhance the knowledge and skills of educationally and economically disadvantaged individuals and result in increasing the employment and earnings of such individuals;

- Statewide coordinated approaches, including model programs, to train, place, and retain women in nontraditional employment. These services may include enhanced outreach,

new training methods and new support systems. An important on-going linkage to the Carl D. Perkins Vocational Education and Applied Technology Education Act (VATEA) "sex equity" provisions is to be recognized through implementing policy when possible.

Several parallel initiatives to overcome sex bias and stereotyping in vocational and related programs are to be supported with VATEA special projects in the community colleges and secondary programs, including mini-grants to overcome sex bias and stereotyping, a model to encourage women in math, science, technology subjects and careers, facilitating access, and measuring accountability in gender equity forums.

(c) ***Describe the anticipated agreements and the agency(ies), administrative entities and SDAs with whom the agreements will be made. [Section 123(b) and 20 CFR 628.315(b).]***

The anticipated agreements will be cooperative agreements between the CDE and the SDA when the primary service delivery provider is a local school district or a county office of education, for all of the 50 percent portion of funds for services to GAIN participants, and for other projects in which the provider of service is not a community college. In those projects where the primary service provider is a community college, the local cooperative agreement will be between the COCCC and the SDA. In projects where there are multiple service providers, the SDA will designate the primary service provider. In those projects where there are multiple service providers and one is a community college, if the agreement is between CDE and the SDA, the COCCC will provide technical assistance and jointly monitor the project with the CDE. In SDAs where there is more than one project, cooperative agreements for each project will be entered into between the appropriate state agency and the SDA.

(d) ***Describe all of the information specified at Section 123(c). [Section 123 and 20 CFR 628.315.]***

The SECG funds are used to facilitate coordination and promote linkages between administrative entities in SDAs and local education agencies. Section 33117.5 of the State Education Code requires the Superintendent of Public Instruction of the CDE to designate an amount necessary to provide educational services to

participants in the GAIN program (Note: GAIN is California's JOBS program). Since PY 1985-86 the Superintendent determined that fifty percent of the 8 percent funds would be allocated to SDAs to provide educational services to GAIN participants. The SJTCC concurred with that determination and recommended that amount to the Governor.

For PY 1993-94, the SJTCC has adopted the following distribution of funds:

Fifty percent of the SECG funds will be used to provide educational services to GAIN participants including adult basic education instruction, General Education Development (GED) preparation and English-as-a-Second Language (ESL) instruction. Job specific training, if provided concurrently with education services can be funded with SECG funds. Fifty percent funds will be allocated by formula to SDAs for purposes of GAIN.

Thirty percent of the SECG funds will be made available through a Request for Application (RFA) process to fund projects providing services for eligible participants in the following programs: school-to-work transition, literacy and lifelong learning, and nontraditional employment for women.

Twenty percent is designated for administration and to facilitate coordination and linkages through Educational Statewide Priorities (ESP) projects.

Goals:

Statewide goals for distribution of the 30 percent funds are: twenty percent for literacy and lifelong learning programs, forty percent for nontraditional employment programs for women, and forty percent for school-to-work transition programs.

Applicant for school-to-work transitional programs must state the goals to be achieved and services to be provided for the following five areas:

- the activities and services that will result in increasing the number of youth staying in or returning to school and graduating from high school or the equivalent;

- the work-based curriculum that will link classroom learning to work site experience and address the practical and theoretical aspects of work;

- the opportunities that will be made available to participants to obtain career-path employment and postsecondary education;

- the integration to be achieved, in appropriate circumstances, in the delivery of services between state and local education agencies and alternative service providers, such as community-based and nonprofit organizations; and

- the linkages that will be established, where feasible, to avoid duplication and enhance the delivery of services, with programs under:

  Title II and Part B of Title IV;

  Elementary and Secondary Education Act;

  Carl D. Perkins Vocational and Applied Technology Education Act;

  Individuals with Disabilities Act;

  Adult Education Act;

  JOBS program;

  Stewart B. McKinney Homeless Assistance Act; and

  National and Community Service Act of 1990.

Applicants for literacy and lifelong learning programs must state the goals to be achieved and services to be provided in the following four areas:

- the activities and services that will increase the knowledge and skills of educationally and economically disadvantaged individuals, and result in increased employment and earnings for such individuals;

- the integration to be achieved between projects assisted under this section and the 4-year State Plan) and related needs

assessment carried out for the plan) developed in accordance with section 342 of the Adult Education Act;

- the variety of settings, including workplace settings, in which literacy training and learning opportunities will be provided; and

- the linkages that will be established, where feasible, to avoid duplication and enhance the delivery of services, with programs under:

  Title II and Title III;

  Adult Education Act;

  Carl D. Perkins Vocational and Applied Technology Act;

  JOBS program;

  Rehabilitation Act of 1973;

  National Literacy Act of 1991;

  Emergency Immigration Act of 1984; and

  National and Community Service Act of 1990.

Applicants for nontraditional employment for women programs must state the goals to be achieved and services to be provided in the program that will provide statewide coordination approaches, including model programs, to train, place and retain women in nontraditional employment.

(e) ***Describe all the state match for the use of these funds. [Section 123(a) and 20 CFR 628.315(e).]***

The 1993-94 Budget Act for the State of California contains a General Fund match for the 8 percent funds in the amount of $8,912,000. The COCCC has committed $500,000 in Carl D. Perkins funds for matching purposes. In addition, California receives numerous federal and state appropriations that fund programs for the economically disadvantaged. Following is a list of other potential federal and state resources that will be used to match the SECG 8% funds:

Federal:

- Adult Education Act (20 U.S.C. 1201 et seq.);
- Elementary and Secondary Education Act of 1965 (Parts A-D of Chapter 1 of Title 1, 20 U.S.C. 2711 et seq.);
- Carl D. Perkins Vocational and Applied Technology Education Act (20 U.S.C. 2301 et seq.);
- Steward B. McKinney Homeless Assistance Act (PL 100-77; 101 Statutes 4820);
- National Literacy Act of 1991 (PL 102-73);
- Immigration Reform and Control Act of 1986; and
- Other federal funding sources as appropriate.

State:

- California General Fund apportionment (i.e. Average Daily Attendance (ADA) for public schools and Full Time Equivalent Student (FTES) for community colleges);
- Adult education state funds; and
- Vocational education state funds;
- State community college categorical and special population programs, including Extended Opportunities and Programs (EOPS) and Disabled Student Programs and Services (DSPS);
- Other state funding sources as appropriate.

7. (a) ***Describe how the state has involved SDAs in planning the use of capacity building and technical assistance funds. [20 CFR 628.305.]***

In anticipation of the increased emphasis on capacity building efforts for PY 1993-94, the state in September formed an advisory group to develop a recommended state capacity building and technical assistance system. The group which was composed of

six SDA Administrators, staff to SJTCC and staff from JTPD, met five times to complete the system.

(b) ***Describe any requirements the state may have developed for the inclusion of a capacity building and technical assistance strategy as part of the planning guidance for the preparation of SDA local job training plans. [20 CFR 628.420.]***

The state requires, through its planning guidance issued to SDAs for preparation of local job training plans, that SDAs describe plans to conduct capacity building and technical assistance activities pursuant to 20 CFR 628.420.

(c) ***Describe how capacity building investments will enhance staff capabilities at the state and local levels, including service providers.***

The new capacity building system is composed of three main components: (1) Compliance Training, (2) Practitioner's Skills Enhancement, and (3) Information Dissemination. The system will be budgeted with 33 percent of the five percent funds and will be accomplished by state, local and contractor staff. The system will expand and enhance past training and technical assistance opportunities which will be provided to state, SDA, PIC, and service providers.

(d) ***Describe the use of resources that will provide technical assistance to SDAs failing to meet performance standards. [Section 121(b)(3).]***

No significant change from current GCSSP (page 22).

(i) ***Specify the percentage of the "five percent" funds available under Section 202(c)(1)(B) that will be used for capacity building and technical assistance.***

The state will utilize up to 33 percent of the five percent funds for capacity building and technical assistance, as permitted under Section 202(c)(1)(B).

(ii) Describe the formula, weighing schemes, and standards for measuring degree of performance to be used in distributing the balance of the funds for incentive grants to SDAs. [20 CFR 629.325.]

No significant change from current GCSSP (pages 19-21).

8. *If the state plans to participate in the incentive bonus program under Title V, Jobs for Employable Dependent Individuals (JEDI), describe how the state will encourage successful implementation of: (a) training activities of eligible individuals whose placement is the basis for the payment to the state of the incentive bonus; and (b) the training services, outreach activities, and pre-employment supportive services provided furnished to these individuals. [Title V of JTPA.]*

The State of California elects not to participate in the JEDI bonus payment program at this time.

IV. SIGNATURE

The signature below is that of the Director of the Employment Development Department, who has been designated by the Governor as the signature authority to apply for and receive Job Training Partnership Act grant awards.

6/14/93
Date

THOMAS P. NAGLE
Director
Employment Development Department
P. O. Box 826880
Sacramento, California 94280-0001

VISION

Early in 1992, a work group of State Job Training Coordinating Council (SJTCC) members appointed by and including the Chair held a series of hearings concerning goals for California's employment and training and education system. Sharing their views with the work group, prominent economists, labor leaders, educators and program operators helped define the issues facing the state in this new age of global competitiveness. A common vision of an appropriate employment and training and education system for California's future emerged from these hearings. The SJTCC then established, as support for this vision, goals and objectives for California's job training and placement programs for the program year 1992-93.

The salient characteristics of this vision included:

- An employment and training and education system working collaboratively for the expressed purpose of upgrading the skills, productivity and competitiveness of the state's work force, and encouraging workers to continue their education over their lifetimes.

- An active private sector involvement in all aspects of the effort to upgrade the work force's skills, including the development of standards of competency and appropriate curricula and providing trainees access to current technology.

- Program accountability, based on outcome standards that are relevant to the needs of the labor market, and which justifies the investment of public funds in terms of increased employment, shorter duration of unemployment, reduction of welfare dependency and overall increase in the employability of the work force.

During the Summer of 1992 the Congress passed, and on September 7, the President signed into law, the *Job Training Reform Amendments of 1992*. These amendments shift the JTPA program into a primary role of preparing:

> "...youth and adults facing serious barriers to employment for participation in the labor force by providing job training and other services that will result in increased employment and earnings, increased educational and occupational skills, and decreased welfare dependency, thereby improving the quality of the work force and enhancing the productivity and competitiveness of the Nation." (Section 2)

The many provisions of the Amendments clearly support the vision developed earlier this year by the SJTCC work group. That portion of the Amendments which target services to individuals facing serious barriers to employment remarkably parallels the emphasis, adopted several years ago by the SJTCC, towards serving High Risk Youth.

The SJTCC is committed towards a rapid and full implementation of the Job Training Reform Amendments, knowing that this will further the original vision. Because these Amendments are substantial, and their implementation will require the full diligence of private industry councils, JTPA administrators, and service providers, the SJTCC is reluctant to add any additional requirements or expectations during this transition period. The Goals and Objectives, previously adopted for PY 92-93, have been revised, consolidated and/or deferred for PY 93-94, in order to support the more critical transition activities and focus; no new goals and objectives have been adopted at this time.

GOALS AND OBJECTIVES
for PY 1993

State Job Training Coordinating Council Mission Statement

The mission of the State Job Training Coordinating Council (SJTCC) is to ensure that the critical areas of economic growth, improved work force productivity, and deterrence of family dependency on public funds are addressed through the job training and vocational education programs in California. Through state and local efforts, the SJTCC will assist in establishing a cooperative partnership between government and the private sector.

GOALS AND OBJECTIVES FOR CALIFORNIA'S JOB TRAINING AND PLACEMENT PROGRAMS PY 1993

This statement of goals and objectives is meant to provide guidance to state agencies, local officials and private industry councils in the formulation of their plans for the delivery of job training and placement services. The goals and objectives are not intended to dictate policy to local authorities and programs, but to define the overall policy framework for the use of state resources.

Goals and Objectives

The purpose of developing goals and objectives for California's job training system is based on: (1) providing guidance to SDAs in developing job training programs and their two year training plans; (2) providing guidance to state and local programs for improving coordination among their respective programs; (3) identifying priorities and program emphasis for state and local agencies involved in job training and vocational education programs; and (4) identifying specific programmatic areas which agencies need to coordinate among their programs to improve system efficiency and success rates. In addition, goals and objectives will establish benchmarks for future evaluation of state and local job training and vocational education programs.

GOALS AND OBJECTIVES

1. WORKFORCE DEVELOPMENT AND ECONOMIC VITALITY

To encourage worker's participation in continuing education and training as a means to constantly improve the workforce's skill level and flexibility and to reduce displacement and unemployment.

Objective: *SJTCC will collaborate with the Departments of Commerce, Education, Community Colleges, Employment Development Department, the Employment Training Panel and the private sector to: (1) devise a strategy or develop a model program to inspire workers towards continuing education, (2) jointly apply for a State Grant under the National Literacy Act to fund the implementation of the strategy /model , and (3) jointly identify small and medium-sized businesses as demonstration sites for testing continuing education strategies and/or programs for employees.*

Objective: *In conjunction with the Department of Education, California Community Colleges, and the employment and training community, the SJTCC will explore the feasibility of articulating training courses by local education agencies, including SDAs and other organizations defined by SJTCC as local education agencies, with those offered through California Community Colleges.*

To develop and strengthen the job opportunities, skill levels, production capacity, and competitive advantage of California's work force.

To clearly focus California's education and employment and training resources on supporting the vitality of the state's economy and meeting the employment needs of California's population.

Objective: *Where appropriate, SJTCC will encourage the SCANS competencies to be incorporated into all aspects of youth and adult employment and training and education programs.*

Objective: *Require that the competencies identified in the SCANS report be incorporated into State JTPA RFP's issued in PY 93-94.*

Objective: *The SJTCC will use Incentive Awards , consistent with the provisions of JTPA Section 106(b), to promote incorporation of SCANS competencies in all JTPA programs.*

To recognize the significant employment potential of women in non-traditional occupations, to promote among women the awareness of such potential and to recruit and train more women for placement into such occupations in order that their skills and talents may contribute further to the competitive advantage of California's work force.

Objective: *The SJTCC, in collaboration with other employment and training and educational service providers, will initiate an awareness campaign for local use to promote the general interest among women in exploring careers and/or available training in non traditional occupations.*

Objective: *The SJTCC, in collaboration with other employment and training and education service providers will, during PY 93-94, develop and publish criteria by which employment and training providers can evaluate their practices of providing career assessment and counseling to program participants.*

Objective: *The SJTCC will continue to promote access and use of technical assistance from Employment & Training providers to replicate successful training programs for women in nontraditional occupations and apprenticeships.*

To enhance and improve the employment skills of long-term AFDC recipients in order to reduce dependency on welfare and contribute to the competitive advantage of California's work force.

Objective: *When targeting JTPA services to AFDC recipients, give first priority for service to long-term AFDC recipients, contingent on approval of the Governor's Welfare Initiative.*

2. PRIVATE SECTOR LEADERSHIP AND INVOLVEMENT

To promote, develop, and increase the direct involvement and support of California's private sector leadership in fashioning and overseeing the state's education and employment and training programs.

To increase the direct participation of business and labor involvement in the design of local job training and vocational education programs.

Objective: *The SJTCC will continue to promote projects which are specifically designed to increase the involvement of the Private Industry Council and/or private sector in the actual curriculum development and oversight of employment and training and vocational education programs.*

Objective: *The SJTCC, in collaboration with other employment and training and education service providers, will conduct public hearings to identify the elements essential to strengthening local public-private partnerships.*

3. EFFECTIVE COORDINATION

To assure full and effective coordination of the various public-funded education and employment and training programs within the state.

Objective: *Where appropriate, the SJTCC will encourage that local JTPA youth and adult programs be matched by Carl D. Perkins Vocational Education funds, as intended and allowed for in the Carl D. Perkins Vocational Education and Applied Technology Education Act (VATEA), and that local JTPA youth and adult programs also be matched with other federal funds, where matching is allowed.*

4. LABOR MARKET AND ECONOMIC FORECASTING

To improve labor market information and economic forecasting capabilities relevant to the planning and implementation of education and employment and training programs at the state and local levels.

To expand statewide the current system of comprehensive labor market occupational supply and demand and follow-up information to meet the needs of education and employment and training organizations in terms of training for entry level jobs and career advancement and for retraining dislocated workers for emerging jobs.

Objective: *The SJTCC will continue to participate with California Occupational Information Coordinating Committee (COICC) member agencies to secure permanent funding through*

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legislation and other sources for the California Cooperative Occupational Information System.

Objective: *The SJTCC will continue to encourage wide distribution and use of labor market information by planners, counselors, students and program participants for program and career planning.*

5. ACCOUNTABILITY

To evaluate the performance of education and employment and training programs in California.

Determine relative impact of the investment of public funds in California, utilizing consistent criteria for reporting and measuring outcomes, including the return on this investment in terms of increased employment, shorter duration of unemployment, reductions in welfare dependency and benefit to the state's economy and citizens.

Objective: *The SJTCC, in collaboration with COICC, will promote inclusion of performance outcome data in the vocational education reporting systems operated by CDE and the Chancellor's Office of the California Community Colleges.*

State-approved Additional Barriers to Employment

State-approved additional barriers	Title II Category			Definition of Barrier	Acceptable Documentation/ Verification may include one or more of the following[1]:
	Adult	In-school-youth	Out-of-school Youth		
1. Alternative school student			X	Any youth enrolled in an alternative school setting including schools such as continuation, corrections, court ordered, community, home study, adult education or special education.	• School records, report cards or statement from school • Referral from school counselor
2. At risk of dropping out of school		X		A youth referred by a school staff person, probation officer or other responsible person documenting chronic attendance problems, or discipline problems, or educational underachievement, and/or other indicators which have been adopted by the local education agency and the PIC.	• Referral from school staff person, probation officer or other responsible person
3. Displaced homemaker	X			An individual who has been providing unpaid services to family members in the home and who has been dependent either on public assistance and whose youngest child is within 2 years of losing eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.); or on the income of another family member but is no longer supported by that income; and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. [See JTPA 4(29)]	• Authorization for cash public assistance • Copy of public assistance check • Medical Card or public assistance identification showing cash grant status • Death certificate, divorce decree, or letter from applicant specifying abandonment of spouse or family member. • Income tax records
4. Limited English language proficient	X	X	X	The inability of an individual, whose native language is not English, to communicate in English.	• Documentation from school or ESL institution • School records or statement from school • Inability to communicate in English as documented by staff
5. Older Individual with low income	X			Individuals age 55 or older whose income does not exceed 125% of the Poverty Guideline.	• Driver license • Birth certificate • Passport • Social Security records • Income tax records • Bank statements • Public assistance records

[1] The Department of Labor TAG on eligibility documentation also contains numerous forms of acceptable documentation which would satisfy the requirement for acceptable documentation.

State-approved additional barriers	Title II Category			Definition of Barrier	Acceptable Documentation/ Verification may include one or more of the following:
	Adult	In-school-youth	Out-of-school Youth		
6. Participant in gang activities	X	X	X	Adult or youth who is involved in organized gang activity as defined by local law enforcement agencies.	• Police report • Referral from law enforcement, probation, social agencies • Referral by community-based gang task force or organization
7. Non-cash welfare recipient	X	X	X	Recipient of non-cash welfare benefits such as Food Stamps or other non-cash benefits	• Food Stamp receipts, cards or letter from Food Stamp disbursing agency • Public assistance records
8. Youth who is a member of a family receiving public assistance		X	X	An individual age 16 through 21 whose family receives public assistance, either in cash or non-cash form regardless of whether the youth is part of the grant. Includes youths in foster care.	• Public Assistance identification card, Medical card, or other welfare agency records • Refugee Assistance Record • Food Stamp receipts, cards or letter from Food Stamp disbursing agency • Court order or court contact • Statement from Foster care agency • Verification of payments made on behalf of foster child
9. Resident of high crime area or high poverty area identified by the PIC.	X	X	X	Individuals residing in a geographic area within the SDA identified as a high crime or high poverty area which is designated by the PIC as a target area for JTPA services. A high crime area is defined by local law enforcement agencies; and a high-poverty area is measured by the number of persons in poverty according to Census tract data.	• Proof of residency such as current driver license; utility bills or other appropriate mailings to individual or individual's family at the claimed home address; Housing Authority verification; landlord statement; letter from social service or public assistance agency.
10 Resident of public housing	X	X	X	Any individual living in subsidized housing or whose family receives housing subsidies, rent assistance or reduced rent via any federal, state, or local housing program.	• Verification by the agency or organization administering the housing program • Utility bill received at address of specific public housing facility • Statement from the Public Housing Authority that the residence is part of the Public Housing project coupled with standard residence documentation
11. Migrant or seasonal farmworker	X	X	X	Adults and youth who are primarily employed, or in the case of youth, whose families are primarily employed, on a seasonal basis in the growth, processing, or transportation of agricultural products.	• UI documentation • Wage records

State-approved additional barriers	Title II Category			Definition of Barrier	Acceptable Documentation/ Verification may include one or more of the following:
	Adult	In-school youth	Out-of-school Youth		
12. Single parent or grandparent with dependent children under age 6	X	X	X	Single parent or grandparent (male or female) who is head of a household with and has parental responsibility for one or more dependent children under the age of 6.	• Public Assistance identification card, Medical Card, or other welfare agency records • Income tax records
13 Substance abuser	X	X	X	Individual with a history of substance abuse, including current or former abuse of either drugs or alcohol.	• Documentation from an organization providing counseling or treatment to drug abusers or alcoholics • Referral from appropriate agency or physician • Referral by Halfway House.
14. Veteran	X	X	X	An individual who served in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable.	• Military discharge papers (DD214) • Documentation from the Veterans Administration
15. Victim of family violence	X	X	X	A victim of spousal, parental, or child abuse or family violence, or a member of a violent or abusive family.	• Police/court records; • child welfare shelter referrals; • Referral by therapists, counselors, or medical personnel. • Child Welfare Service Referral

Exhibit 2

Criteria for State's Approval of Additional Barriers

If the proposed barrier:	And the proposed barrier:	Then the state will:
1. Is on the state-approved list of additional barriers	a. Is a single barrier or b. Is combined with: 1) another barrier on the state-approved list, or: 2) one or more factors such as economic disadvantage, poor work history, or unemployment or long-term unemployment	Approve the category as an additional barrier.
2. Is not on the list of state-approved additional barriers and is not on the list of categories for hard-to-serve under §203(b); §263(b); or 263(d)	a. Would meet the definition of barrier to employment or artificial barrier to employment as defined in the JTPA glossary (JTPA Directive 87-7)[1] ; has supportable basis in the SDA for inclusion[2]; and can be acceptably documented[3]	Approve the category as an additional barrier.
	b. Is solely comprised of individuals with a poor work history or individuals who are unemployed	Not approve the category; this is not an acceptable additional barrier because §203(d) and §263(b) prohibit an additional barrier comprised solely of individuals who are unemployed or who have poor work histories.
	c. Cannot be supported by written or acceptable alternative forms of documentation other than self-certification	Not approve the category; adequate and supportable documentation is necessary to avoid audit exceptions based on inadequate documentation.
	d. Cannot be adequately addressed or overcome by the services available through the SDA or its peripheral resources	Not approve as there would be no point in serving people whose barriers cannot be overcome by the services available.
3. Is included on the list of categories for hard-to-serve under §203(b); §263(b); or 263(d)		Not approve as a category of additional barrier because it is already an authorized barrier.

1 Barriers to Employment: Any demonstrable characteristic of an applicant that has, in the applicant's opinion, served to limit, hinder or prohibit that person's opportunities for employment and/or promotion. Differentiate from artificial barriers to employment. Artificial Barrier to Employment: Limitations such as age, sex, race, national origin, or physical status) in hiring, firing, promotion, licensing, and conditions of employment that are not directly related to an individual's fitness or ability to perform the tasks required by the job.

2 The proposed barrier must be identified as being an employment barrier to potentially eligible JTPA participants within the SDA and the SDA has evidence for justification.

3 Examples of acceptable documentation can be found in the list of state-approved barriers and in the Department of Labor's (DOL) Technical Assistance Guide on Title II Eligibility Documentation.

Approved SDA-Selected Additional Barriers

Exhibit 3

SDA	Title II-A–Adults SDA Selected Barrier	Title II-C–In-School SDA Selected Barrier	Title II-C–Out-of-School SDA Selected Barrier
Alameda	Selection pending	Selection pending	Selection pending
Anaheim	Resident of high crime/pov area	At risk of dropping out	Alternative School Student
Butte	Single parent, child under 6	At risk of dropping out	Public Assistance Family Member
C/L/T	Non-cash welfare recipient	At risk of dropping out	Alternative School Student
Contra Costa	Res. of high poverty area	Public Assistance Family Member	Public Assistance Family Member
Foothill	Res. high crime/pov. area	Public Assistance Family Member	Res. high crime/pov. area
Fresno	Single parent, child under 6	At risk of dropping out	Alternative School Student
Golden Sierra	Non-cash welfare recipient	Public Assistance Family Member	Public Assistance Family Member
Humboldt	Non-cash welfare recipient	Public Assistance Family Member	Alternative School Student
Imperial	Res. of high poverty area	Res. of high poverty area	Res. of high poverty area
Kern/Inyo/Mono	Veteran	At risk of dropping out	Public Assistance Family Member
Kings	Non-cash welfare recipient	Non-cash welfare recipient	Alternative School Student
LA City	Selection pending	Selection pending	Selection pending
LA County	Non-cash welfare recipient	At risk of dropping out	Public Assistance Family Member
Long Beach	Res. of high poverty area	Res. of high poverty area	Res. of high poverty area
Madera	Res. of high poverty area	Public Assistance Family Member	Public Assistance Family Member
Marin	Non-cash welfare recipient	Resident of high crime/pov area	Alternative School Student
Mendocino	Single parent, child under 6	Single parent, child under 6	Alternative School Student
Merced	Res. of high poverty area	Public Assistance Family Member	Public Assistance Family Member
Monterey	Non-cash welfare recipient	At risk of dropping out	Alternative School Student
Mother Lode	Substance Abuser	At risk of dropping out	Alternative School Student
Napa	Veteran	At risk of dropping out	Racial/Ethnic minority
NoRTEC	Veteran	Public Assistance Family Member	Alternative School Student
North Central	Non-cash welfare recipient	At risk of dropping out	Alternative School Student
NOVA	Non-cash welfare recipient	Public Assistance Family Member	Alternative school student
Oakland	Limited English proficient	Limited English proficient	Limited English proficient
Orange	Limited English proficient	Limited English proficient	Limited English proficient
Richmond	Resident of high crime/pov area	Resident of high crime/pov area	Resident of high crime/pov area
Riverside	Displaced Homemaker	At risk of dropping out	Substance Abuser
Sacramento	Resident of high crime/pov area	Public Assistance Family Member	Public Assistance Family Member
San Benito	Migrant/seasonal Farmwkr	Public Assistance Family Member	Public Assistance Family Member
San Bern. City	Selection pending	Selection pending	Selection pending
San Bern. Co.	Selection pending	Selection pending	Selection pending
San Diego	Veteran	Public Assistance Family Member	Public Assistance Family Member
San Francisco	Limited English proficient	Racial/ethnic minority	Racial/ethnic minority
San Joaquin	Resident of high crime/pov area	At risk of dropping out	Alternative School Student
San Mateo	Selection pending	Selection pending	Selection pending
SanLuisObispo	low income older individual	At risk of dropping out	Alternative School Student
Santa Ana	Resident of high crime area	Resident of high crime area	Resident of high crime area
Santa Barbara	Non-cash welfare recipient	Racial/ethnic minority	Racial/ethnic minority
Santa Clara	Resident of high crime/pov area	Resident of high crime/pov area	Resident of high crime/pov area
Santa Cruz	low income older individual	Racial/ethnic minority	Racial/ethnic minority
SELACO	Resident of high crime/pov area	Resident of high crime/pov area	Resident of high crime/pov area
Shasta	Single parent, child under 6	Public Assistance Family Member	Alternative School Student
Solano	Veteran	None selected	Public Assistance Family Member
Sonoma	Non-cash welfare recipient	At risk of dropping out	Alternative School Student
South Bay	Resident of high crime/pov area	At risk of dropping out	Resident of high crime/pov area
Stanislaus	Limited English Proficient	At risk of dropping out	Alternative School Student
Tulare	Limited English proficient	Public Assistance Family Member	Public Assistance Family Member
Ventura	Selection pending	Selection pending	Selection pending
Verdugo	Selection pending	Selection pending	Selection pending
Yolo	Limited English proficient	At risk of dropping out	Alternative School Student